

From: [Richard Campbell](#)
To: [Campbell, Richard](#)
Subject: Fw: West Lake Landfill: additional work letter to PRPs
Date: Monday, October 21, 2013 12:55:03 PM
Attachments: [Scanned from a Xerox multifunction device001.pdf](#)

----- Forwarded by Richard Campbell/R4/USEPA/US on 10/21/2013 01:54 PM -----

From: Amy Legare/DC/USEPA/US
To: Andy Zownir/ERT/R2/USEPA/US@EPA, Cami Grandinetti/R10/USEPA/US@EPA, Carlos Sanchez/R6/USEPA/US@EPA, Charles Openchowski/DC/USEPA/US@EPA, Craig Smith/SUPR/R7/USEPA/US@EPA, David Jewett/ADA/USEPA/US@EPA, Ed Barth/CI/USEPA/US@EPA, Hollis Lizecky/DC/USEPA/US@EPA, John Chesnutt/R9/USEPA/US@EPA, John Frisco/R2/USEPA/US@EPA, Linda Dietz/R3/USEPA/US@EPA, Lois Gartner/DC/USEPA/US@EPA, Mark Sprenger/ERT/R2/USEPA/US@EPA, Michael Sivak/R2/USEPA/US@EPA, Mike Jasinski/R1/USEPA/US@EPA, Peter Ludzia/R3/USEPA/US@EPA, REBECCA FREY/R5/USEPA/US@EPA, Richard Campbell/R4/USEPA/US@EPA, Ron Wilhelm/DC/USEPA/US@EPA, Stanley Christensen/R8/USEPA/US@EPA, Timothy Mott/DC/USEPA/US@EPA, Timothy Prendiville/R5/USEPA/US@EPA
Date: 11/14/2012 11:41 PM
Subject: Fw: West Lake Landfill: additional work letter to PRPs

fyi

Amy R. Legare
U.S. Environmental Protection Agency
OSWER/OSRTI/ARD/SARDB
5828 Potomac Yard South
MC 5204P
703-347-0124

----- Forwarded by Amy Legare/DC/USEPA/US on 11/14/2012 11:40 PM -----

From: Doug Ammon/DC/USEPA/US
To: Amy Legare/DC/USEPA/US@EPA
Date: 10/31/2012 05:07 PM
Subject: Fw: West Lake Landfill: additional work letter to PRPs

Amy,
The region is working with the PRP group to address what they state are the NRRB recommendations.

Douglas Ammon, P.E.
Chief, Site Assessment and Remedy Decisions Branch
Superfund Program U.S. EPA Mail Code 5204P
1200 Pennsylvania Ave. N.W.
Washington DC 20460
703-347-8925
703-927-3971 (cell)

----- Forwarded by Doug Ammon/DC/USEPA/US on 10/31/2012 04:59 PM -----

From: Dan Gravatt/R7/USEPA/US
To: Doug Ammon/DC/USEPA/US@EPA
Date: 10/23/2012 12:25 PM
Subject: West Lake Landfill: additional work letter to PRPs

Doug, here it is, as we discussed earlier.

Sincerely,
Daniel R. Gravatt, PG
US EPA Region 7 SUPR / MOKS
11201 Renner Boulevard, Lenexa, KS 66219
Phone (913) 551-7324

Principles and integrity are expensive, but they are among the very few things worth having.

----- Forwarded by Dan Gravatt/R7/USEPA/US on 10/23/2012 11:24 AM -----

From: RO-1.2-CopyRoom-East-X7545@epa.gov
To: Dan Gravatt/R7/USEPA/US@EPA
Date: 10/23/2012 11:20 AM
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

OCT 12 2012

Steven Miller, Esq.
U.S. Department of Energy
Office of General Counsel
GC-51, Forrestal 6A-113
Washington, D.C. 20585

Re: *In the Matter of Cotter Corporation (NSL), and Laidlaw Waste Systems (Bridgeton), Inc. and Rock Road Industries, Inc. and the U.S. Department of Energy*
Administrative Order on Consent, EPA Docket No. VII-93-F-0005

Dear Mr. Miller:

This is to confirm that as Respondents to the above-captioned Administrative Order on Consent (Consent Order) for a Remedial Investigation/Feasibility Study (RI/FS), you have agreed to perform additional work pursuant to Paragraph 51 of the Consent Order. Your agreement was previously conveyed to me in our conference call on June 14, 2012. The U.S. Environmental Protection Agency National Remedy Review Board recommended this work be performed for Operable Unit 1 of the West Lake Landfill Superfund Site after participating with Region 7 in an early consultation on Region 7's selection of the remedy and the Supplemental Feasibility Study which Respondents prepared. The NRRB recommendations that Region 7 seeks to have implemented at this time include more detailed evaluations of (i) the partial excavation alternative; (ii) alternative landfill cap designs; and (iii) treatment technologies.

Through technical discussions between EPA Remedial Project Manager Dan Gravatt and your consultant, Paul Rosasco, Respondents agreed to perform an additional round of groundwater sampling. This work has now been undertaken and results of the sampling are pending. Respondents also agreed to perform the following:

1. Alternative Excavation Volume – Respondents shall revise the excavation volume to exclude the deep radiological detections in borings WL-210 and WL-235, which the NRRB believes are unreliable.
2. Partial Excavation Alternative – Respondents shall define the parameters to be used to define the extent and configuration of the waste materials to be included in the Partial Excavation with Off-Site Disposal and Partial Excavation with On-Site Disposal, and then update the analysis of this alternative presented in the RI/FS at a level of detail comparable to the alternatives already analyzed in the SFS.
3. Apatite Treatment Technologies – Respondents shall evaluate potential applications of apatite and/or phosphate solutions for possible treatment of waste materials and/or groundwater at a level of detail comparable to the treatment technologies already analyzed in the SFS.



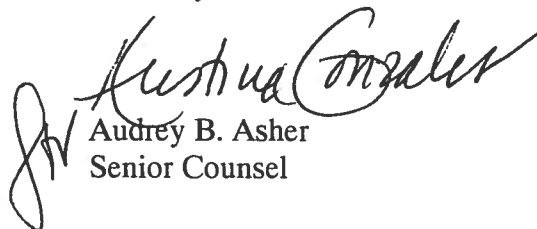
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4. Respondents shall recalculate costs for all alternatives, using a seven percent Discount Rate for the Present Value calculations.
5. Alternative Landfill Cap Designs – Respondents shall evaluate potential alternative landfill cover designs including but not limited to an Evapotranspiration (ET) cover.
6. Fate and Transport Modeling – Respondents shall submit a geochemical model to assess the potential mobility and potential leachability of the radionuclides, followed by (if necessary) an unsaturated zone transport model, followed by a site-specific groundwater flow and transport model (if the prior two models indicate that a potentially measurable impact to groundwater may occur), followed by (if necessary) a regional groundwater flow and transport model to address possible transport to the river; and if necessary, a surface water flow and transport model to address possible transport within the river.

Respondents shall provide a work plan and a schedule for the work described above for the EPA review which will be mutually acceptable to the EPA and Respondents. Respondents shall document the work performed in an amendment to the SFS report.

The Consent Order remains in effect until terminated by the EPA. Unless any Respondent indicates otherwise in writing to me, this letter accurately reflects the agreement by all parties to the Consent Order to perform additional work.

Sincerely,



Audrey B. Asher
Senior Counsel

Enclosure: List of letter recipients

cc: Sarah Himmelhoch, DOJ-EES
Dan Gravatt, SUPR
Shawn Muenks, MDNR

Recipients to Westlake Landfill Letter

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and Rock Road Industries, Inc. and the U.S. Department of Energy
Administrative Order on Consent, EPA Docket No. VII-93-F-0005*

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